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1 2 3 4 5	SHEA & SHEA A PROFESSIONAL LAW CORPORATION MICHAEL M. SHEA (State Bar No. 38396) MICHAEL M. SHEA, JR. (State Bar No. 126983) MARK B. O'CONNOR (State Bar No. 126960) NICOLE N. HANCOCK (State Bar No. 221457) THE JAMES SQUARE BUILDING 255 NORTH MARKET STREET, SUITE 190 SAN JOSE, CA 95110 Phone: (408) 292-2434	
6	Fax : (408) 292-1264 Attorneys for Plaintiff	
7	Attorneys for Frameni	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10		DOCKETNI G 00 02000 DG
11	CHAD NICHOLAS,	DOCKET No. C 09-02089 RS
12	Plaintiff,	STIPULATION AND [ <del>PROPOSED</del> ] ORDER REGARDING NON-EXPERT DISCOVERY
13	vs.	AND EXPERT DISCOVERY
14	UNITED AIR LINES, INC., and DOES 1 through 50, inclusive,	
15 16	Defendants.	,
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18	The parties have met and conferred and have agreed to stipulate as follows:	
19	1. That the parties shall be allowed to conduct certain discovery beyond the May 19, 2010	
20	discovery cut-off. The discovery which is permitted to take place after May 19, 2010	
21	includes:	
22	a. Any depositions noticed before the May 19, 2010 discovery cut off;	
23	b. The deposition of Shirley Nicholas;	
24	c. Plaintiff will agree to produce updated medical records as his treatment	
2 <del>4</del> 25	continues.	
25 26	2. Due to the unavailability of certain deponents until after June 1, the parties have agreed	
20 27	to postpone expert disclosures & discovery as follows:	
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## Case 5:09-cv-02089-RS Document 32 Filed 06/02/10 Page 2 of 2 a. Plaintiff's expert disclosure is due June 16, 2010. 1 b. Defendant's expert disclosure is due June 30, 2010. 2 c. Expert discovery will be completed by July 14, 2010. 3 4 Dated: June 1, 2010 5 **SHEA & SHEA** 6 7 /s/ By: 8 NICOLE N. HANCOCK, ESQ. Attorneys for Plaintiff 9 CHAD NICHOLAS 10 Dated: June 1, 2010 11 SHEA & SHEA 12 /s/ 13 By: ELIZABETH RHODES, ESQ. Attorneys for Defendant 14 UNITED AIR LINES, INC. 15 16 17 18 19 <del>[PROPOSED</del>] ORDER 20 IT IS SO ORDERED. 21 22 6/2/10 Dated: 23 24 25 26 27